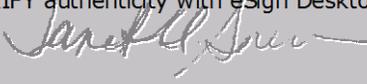




September 2, 2015

MEMORANDUM FOR: JOHN J. DIPERI
DISTRICT MANAGER, ARIZONA DISTRICT

E-Signed by Janet Sorensen 
VERIFY authenticity with eSign Desktop


FROM: Janet M. Sorensen
Deputy Assistant Inspector General
for Revenue and Resources

SUBJECT: Management Alert – Working Conditions at the 
Office (Report Number HR-MA-15-004)

This management alert presents concerns regarding poor working conditions at the U.S. Postal Service's  Office in New Mexico (Project Number 15RG032HR000). This alert responds to an inquiry from U. S. Senator Tom Udall's office.

We appreciate the cooperation and courtesies provided by your staff. If you have any questions or need additional information, please contact Monique Colter, director, Human Resources and Support, or me at 703-248-2100.

cc: Corporate Audit and Response Management

Attachment

Introduction

This management alert responds to concerns brought to our attention by U.S. Senator Tom Udall's office about poor working conditions at the U.S. Postal Service's ██████ Office in New Mexico (Project Number 15RG032HR000).

Senator Udall's office received daily complaints from customers alleging poor working conditions at the ██████ Office, which included no heating or cooling, burned out light bulbs, water leakage from the roof, problems with electrical wiring, and asbestos issues.¹ Additionally, a ██████ Commissioner complained about the lack of heating and its effect on employees.

The Postal Service, like most employers in the U.S., is fully subject to the Occupational Safety and Health (OSH) Act of 1970² and must comply with Occupational Safety and Health Administration (OSHA) standards and regulations. The OSH Act requires Postal Service management to provide a safe and healthy workplace that is free of recognized hazards and to follow OSHA standards.

Conclusion

Working conditions at the ██████ Office were deplorable. Although management recently replaced one of two heating, ventilating, and air conditioning (HVAC) systems; heating and air at this facility have been inadequate for 6 years. Additionally, we found issues with lighting, electrical wiring, plumbing, and bathroom fixtures; cracked windows; water damage; and a cockroach infestation. See [Appendix A](#) for images in Figures 2 through 12.

██████ are required to inspect their facilities³ and initiate action when repairs are needed.⁴ Additionally, Postal Service managers are required to demonstrate a commitment to providing safe and healthy working conditions.⁵ Although the ██████ at the facility worked to resolve the problems with the HVAC, ██████ did not report many of the other issues we found because she was unaware of any requirement or method for including additional health and safety issues into the Safety Toolkit⁶ as part of the

¹ According to the Occupational Safety and Health Administration, some building materials (i.e. vinyl floors, ceiling tiles, plaster and caulk, etc.) are presumed to contain asbestos if installed prior to 1981. Asbestos exposure occurs during renovation of a building when fibers are disturbed and become airborne.

² In calendar year 1998, the Postal Employees Safety Enhancement Act (PESEA) (Public Law 105-241, Postal Employees Safety Enhancement Act, September 28, 1998) changed the status of the Postal Service as an employer under the OSH Act of 1970.

³ Maintenance Handbook MS-110, *Associate Office Postmaster's Facilities Maintenance Guidelines*, Section 312, page 3-1, dated January 15, 1988.

⁴ Maintenance Handbook MS-110, Section 111, page 1-1, dated January 15, 1988.

⁵ Handbook EL-802, *Executives' and Managers' Safety and Health Program and Compliance Guide*, Section 4-2.1, page 8, dated June 2009.

⁶ The Safety Toolkit is an online, interactive management tool for safety personnel that is used to record and track facility inspections, program evaluation guides, and OSHA citations, and *Employee and Labor Relations Manual* 38, Section 824.331, pages 765-766, dated March 2015.

annual inspection. Also, the manager of Post Office Operations did not conduct periodic observations at the post office. Although this facility has materials with asbestos, exposure would be limited since it's not currently under renovation. Poor working conditions increase risks to the health and safety of employees and customers and could lower employee morale and productivity.

Working Conditions at the [REDACTED] Post Office

Working conditions at the [REDACTED] Office were deplorable. The facility had two improperly working HVACs. Management recently replaced one HVAC; however, the heating and air at this facility have been inadequate for 6 years. During our review, we also found issues with lighting, electrical wiring, plumbing, and bathroom fixtures; cracked windows; water damage; and a cockroach infestation.

Heating and Air

Postal Service personnel and customers complained that the [REDACTED] Office had no heating or air conditioning (AC). The two HVACs on the roof of the facility did not work properly. The Postal Service also received an OSHA complaint on June 27, 2013,⁷ documenting a notice of alleged workplace hazards at the Post Office. In the complaint, OSHA cited nonworking AC, which led to high temperatures that exposed employees to heat stress. The Postal Service informed OSHA that it had repaired the AC and it was operational on the same day the complaint was received.

After reviewing the facility's maintenance records in the Electronic Facilities Management System (eFMS),⁸ we found reports of the malfunctioning heating or AC dating back to fiscal year (FY) 2009 (see Table 1).

Table 1. Summary of HVAC Repair Calls

FY	Number of Repair Requests	Description
2009	1	Both AC units down
2010	2	One or both AC units down
2011	1	AC not blowing cold air
2012	1	AC not working properly
2013	4	AC not working properly
2014	2	AC not working properly and putting out hot air
2015	3	AC and heating not working and blower smokes

Source: eFMS.

⁷ OSHA Complaint Number 826141, dated June 27, 2013.

⁸ The eFMS database is the Postal Service's official record for real property inventory and the management system for administering all property-related projects, including acquisition, design, construction, disposal, repair, health and safety mitigation, and property inspections.

Management replaced one of the two HVAC units on April 30, 2015. After the new HVAC unit was installed, the contractor instructed Postal Service personnel to use the second HVAC unit in a fan-only mode to circulate air. However, according to eFMS records, the second HVAC unit had previously malfunctioned and filled the facility with smoke.

The average summer temperature in [REDACTED], can range from 89 to 95 degrees, with highs of up to 115 degrees. Average winter temperatures range from 28 to 32 degrees, with lows of -11 degrees recorded. To alleviate the extreme heat in the summer, Post Office personnel used fans and portable AC. To alleviate the extreme cold in the winter, they used space heaters and propane-fueled heaters, which sometimes blew the fuses in the facility. Personnel used their own funds to buy fans, the portable AC unit, ice, and space heaters.

According to Postal Service policy, heating systems should be inspected to determine whether they are capable of maintaining an adequate temperature of 65 degrees and whether the AC is capable of maintaining a reasonable temperature of 78 degrees.⁹ This is closely aligned with OSHA's air treatment recommendations that temperature control be in the range of 68 to 76 degrees.¹⁰

Postal Service personnel reached out repeatedly to the facility landlord, the manager of Post Office Operations (MPOO), and Postal Service facilities and maintenance personnel and believed the HVAC issues were being handled. The [REDACTED] priority was moving the mail and did not continually monitor the situation.

The MPOO and acting MPOO were aware of the HVAC conditions and had been working on getting the HVAC repaired since 2013; but neither had recently visited the [REDACTED] Office at the time of our review. District officials were aware of the OSHA complaint and believed the HVAC unit was repaired; however, they did not know the HVAC continued to malfunction and were not notified of ongoing issues until March 2015.

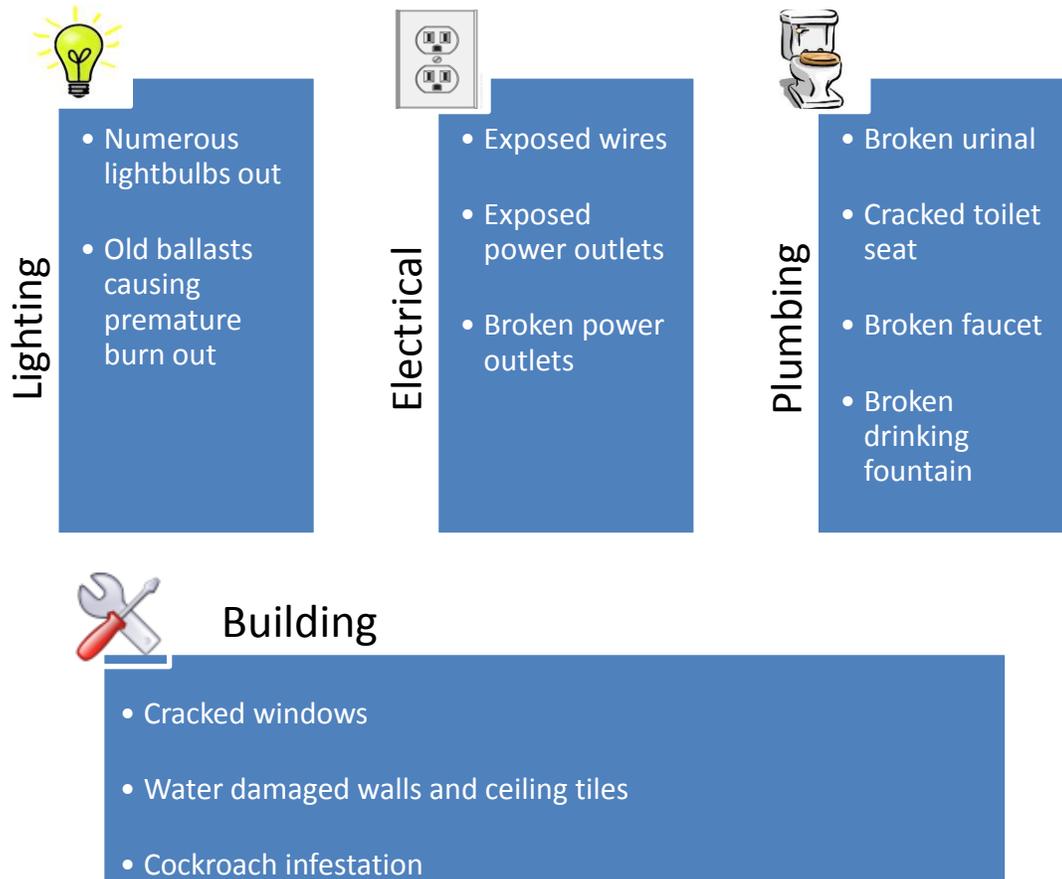
⁹ Maintenance Handbook MS-110, Sections 322.6 and 322.7, page 3-2, dated January 15, 1988.

¹⁰ OSHA *Technical Manual* (OTM), Section III: Chapter 2 – Indoor Air Quality Investigation, dated January 20, 1999.

Building and Equipment Repairs and Maintenance

Postal Service personnel and customers at the █████ Office were subject to poor lighting, exposed electrical connections, broken plumbing, and a deteriorating building (see Figure 1).

Figure 1. Conditions Found at the █████ Office



- The major lighting issues are the result of old ballasts¹¹ that cause the lights to burn out when they are switched on and off. According to records in the eFMS a repair request was submitted in September 2014 for replacement of 150 light bulbs. It was not until maintenance personnel visited the Post Office, November 2014, and saw the extent of the outage they took steps to resolve the lighting issues. When the lights were replaced in February 2015 only some of the ballasts were replaced; since most of the old ballasts are still in use, the lights continue to burn out prematurely (see [Figure 2](#) in Appendix A).
- We notified Post Office employees of the unsafe exposed wiring and cracked and exposed outlets after our walkthrough of the facility. One area had exposed wires

¹¹ In a fluorescent lighting system, the ballast regulates the current to the lights and provides sufficient voltage to start them.

protruding from the ceiling (see [Figure 3](#) in Appendix A) and two cracked power outlets with exposed components (see [Figure 4](#) and [Figure 5](#) in Appendix A).

- The significant plumbing problems in the men's bathroom and the water fountain existed prior to the current [REDACTED] arrival in August 2013. The men's bathroom had a broken urinal (see [Figure 6](#) in Appendix A) and a cracked toilet seat (see [Figure 7](#) in Appendix A). The drinking fountain did not dispense water or drain properly (see [Figure 8](#) in Appendix A). The faucet in the women's bathroom recently broke but was still slightly functional (see [Figure 9](#) in Appendix A).
- We observed multiple cracked windows with evidence of water seepage (see [Figure 10](#) and [Figure 11](#) in Appendix A) and water-damaged ceiling tiles and walls throughout the facility (see [Figure 12](#) in Appendix A). During heavy downpours, water leaks into the interior of the building and pools on the lobby floor near the Post Office boxes. The landlord previously sent contractors to repair or patch the roof; however, leaks continued during extremely heavy downpours. We also observed cockroaches inside the facility and were told there was an infestation.

The [REDACTED] was appointed to the [REDACTED] Office in August 2013. Many of the conditions mentioned in this report existed prior to the [REDACTED] arrival. However, the [REDACTED] had not reported the needed repairs, with the exception of the burned out lightbulbs and some of the plumbing issues. As of our meeting with district officials on June 16, 2015, the [REDACTED] had reported one additional plumbing issue for repair. In addition, the [REDACTED] submitted an eBuy¹² request for monthly exterminator services for the next 12 months.

The [REDACTED] did not report the needed building and equipment repairs and maintenance, believing it would be futile because of the way HVAC repair requests had been handled. District officials were not aware of the building and equipment conditions that required repair and maintenance. However, once made aware of the conditions district officials immediately initiated corrective actions to resolve the building and equipment repairs.

As the facility safety coordinator,¹³ the [REDACTED] is required to conduct an annual inspection and report the results using an approved inspection checklist into the Safety Toolkit.¹⁴ A review of the current checklist revealed there were no questions on the health and safety checklist that directly addressed the conditions identified in this report. The [REDACTED] completed the inspection for the 2 previous fiscal years and reported no deficiencies because the [REDACTED] was unaware of any requirement or method for including additional health and safety issues into the Safety Toolkit as part of the annual

¹² eBuy is the official Postal Service enterprise tool for ordering goods and services.

¹³ The facility safety coordinator is the installation head at facilities with no full-time safety positions who performs safety-related duties appropriate to the size and function of the facility.

¹⁴ ELM 38, Section 824.331, pages 765-766, dated March 2015.

inspection. However, the [REDACTED] could have created additional deficiencies in the Safety Toolkit.

[REDACTED] are required to completely inspect their facilities twice a year to determine the condition of the building and grounds before the onset of winter weather and spring rains.¹⁵ Furthermore, they are responsible for initiating action when repairs are needed.¹⁶ At the same time, Postal Service managers are required to demonstrate a commitment to providing safe and healthful working conditions at all Postal Service-owned and leased installations and become involved in day-to-day safety performance.¹⁷

When poor working conditions exist, the health and safety of employees and customers may be at risk and could result in low employee morale.

Recommendations

We recommend the District Manager, Arizona District:

1. Resolve building and equipment conditions at the [REDACTED] Office that require repair or maintenance.
2. Establish procedures for the manager of Post Office Operations to conduct periodic observations at all post offices to assess working conditions and create an action plan to resolve any issues that could affect employee health and safety.
3. Provide Safety Toolkit training to facility safety coordinators.

Management's Comments

Management agreed with the finding and recommendations.

Regarding recommendation 1, management stated there were efforts underway to correct known facility condition issues. Pest control services were obtained and a monthly plan was established to ensure re-infestations do not occur. The lighting (bulbs and ballasts), exposed wires, two broken power outlets, urinal, toilet seat, water fountain and faucet have been either repaired or replaced. The cracked windows, water-damaged walls and ceiling tiles are scheduled to be repaired or replaced. The target date for completion is September 8, 2015.

Regarding recommendation 2, management stated they issued a mandatory requirement for each MPOO to conduct periodic observations at all post offices. Additionally, all MPOOs must create and submit for approval a proposed schedule of periodic observations. The target date for completion is October 1, 2015.

¹⁵ Maintenance Handbook MS-110, Section 312, page 3-1, dated January 15, 1988.

¹⁶ Maintenance Handbook MS-110, Section 111, page 1-1, dated January 15, 1988.

¹⁷ Handbook EL-802, Section 4-2.1, page 8, dated June 2009.

Regarding recommendation 3, management stated the [REDACTED] was trained and instructed in the proper use of the USPS Safety Toolkit, and district-wide training will be conducted by the Arizona District Safety Office. The target date for completion is September 30, 2015.

See [Appendix B](#) for management's comments, in their entirety.

Evaluation of Management's Comments

The U.S. Postal Service Office of Inspector General (OIG) considers management's comments responsive to the recommendations in the report.

The OIG considers all recommendations significant, and therefore requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when corrective actions are completed. These recommendations should not be closed in the Postal Service's follow-up tracking system until the OIG provides written confirmation that the recommendations can be closed.

Appendix A: Images

The following images document building and equipment conditions at the [REDACTED] Office.

Figure 2 – Lighting



Source: U.S. Postal Service Office of Inspector General (OIG) photograph.

Figure 3 – Exposed Wires



Source: OIG photograph.

Figure 4 – Broken Power Outlet



Source: OIG photograph.

Figure 5 – Broken Power Outlet



Source: OIG photograph.

Figure 6 – Broken Urinal



Source: OIG photograph.

Figure 7 – Cracked Toilet Seat



Source: OIG photograph

Figure 8 – Broken Water Fountain



Source: OIG photograph.

Figure 9 – Broken Faucet



Source: OIG photograph.

Figure 10 – Cracked Window



Source: OIG photograph.

Figure 11 – Cracked Window



Source: OIG photograph.

Figure 12 – Water-Damaged Wall and Ceiling Tiles



Source: OIG photograph.

Appendix B. Management's Comments

ARIZONA DISTRICT



August 31, 2015

Laurie Dillard
Director, Audit Operations
USPS OIG

**SUBJECT: Management Alert - Working Conditions at the [REDACTED] Office
(Report Number HR-MA-15-DRAFT)**

Ms. Dillard:

Arizona District management has reviewed the above referenced report in its entirety and agrees with each finding and observation. Before the Arizona District was visited by the OIG regarding the conditions at the [REDACTED] Office, there were efforts underway to correct known facility condition issues at the [REDACTED] Office and we regret that the corrections were not made in a timelier manner by the landlord first, and the USPS second.

Recommendation 1: Resolve building and equipment conditions at the [REDACTED] Office that require repair or maintenance.

Management Response/Action Plan:

Management agrees with the recommendation and pest control services are now being provided to the facility from ECOLAB and there are no further reports of cockroaches, bugs, etc. There is a monthly pest control plan setup with ECOLAB to ensure bug infestations do not reoccur. Figures 2 thru 9 listed in the above referenced report have been either repaired or replaced.

The cracked windows, water-damaged wall, and ceiling tiles (figures 10 thru 12) have not been repaired or replaced; however, Wes Redmond, Manager of Post Office Operations, has received a commitment from the [REDACTED] Office landlord's maintenance representative that the items referenced above will be replaced or repaired no later than Friday, September 4, 2015.

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PHOENIX, ARIZONA 85026
(602) 225-5400
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Target Implementation Date:

September 8, 2015, is the target implementation date when all repairs or replacements will be finished and verified as complete.

Responsible Official:

Wes Redmond, Manager of Post Office Operations, is the responsible official that will follow-up on the remaining repairs or replacements needed at the [REDACTED] Office. Mr. Redmond will ensure that any repair and/or replacement work that is performed by employees or contractors hired by the [REDACTED] Office landlord are performed in a manner so as not to disrupt postal operations or compromise employee and customer safety.

Recommendation 2:

Establish procedures for the Manager of Post Office Operations to conduct periodic observations at all post offices to assess working conditions and create an action plan to resolve any issues that could affect employee health and safety.

Management Response/Action Plan:

Management agrees with the recommendation. John J. DiPeri, Arizona District Manager has issued a mandatory requirement for each Manager of Post Office Operations to conduct periodic observations at all post offices to assess working conditions and create an action plan to resolve any issues that could affect employee health and safety. In addition, the Arizona District is creating a database that will include interior and exterior photos of every postal facility within the District as a proactive measure to look for possible safety or image issues that may have been overlooked by Postmasters and Station Managers.

Target Implementation Date:

All Managers of Post Office Operations must create and submit their proposed schedule of periodic observations and action plans to the AZ District Manager for review and approval by September 15, 2015. October 1, 2015, is the target implementation date.

Responsible Official:

John. J. DiPeri, Arizona District Manager is the responsible official that will follow-up with each Manager of Post Office Operations to ensure there are no deviations to the periodic observation schedules or action plans that are submitted and approved.

Recommendation 3:

Provide Safety Toolkit training to facility safety coordinators.

Management Response/Action Plan:

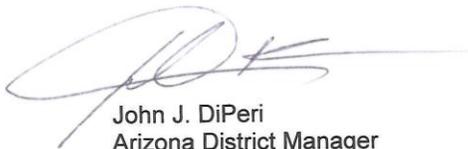
Management agrees with the recommendation and has provided training to the [REDACTED] IM, on August 20, 2015. District-wide Safety Toolkit training (which includes all facility safety coordinators) will be conducted and recorded throughout the month of September 2015 by the Arizona District Safety Office.

Target Implementation Date:

September 30, 2015, is the target implementation date that all facility safety coordinators within the Arizona District will be trained on the proper and required use of the Safety Toolkit.

Responsible Official:

Nancy Rodriguez, Arizona District Safety Manager, is the responsible official that will follow-up to ensure each facility safety coordinator has completed Safety Toolkit training by September 30, 2015.



John J. DiPeri
Arizona District Manager

cc: Sally K. Haring